

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

4:23-cv-05448-YGR

**DECLARATION OF ANDRE SUITE IN
SUPPORT OF OMNIBUS FILING
REGARDING SEALING JOINT LETTER
BRIEF ON META'S RESPONSE TO
STATE ATTORNEYS GENERALS'
REQUEST FOR PRODUCTION
NUMBER 102**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF ANDRE SUITE

I, Andre Suite, declare and state as follows:

1. I am Director of Global Security Threat Management and Privacy Response at Meta Platforms, Inc. ("Meta"). I have been employed at Meta for approximately 10 years, and I lead the team that is responsible for the investigation and possible mitigation of all external threats directed towards Meta's employees. I submit this Declaration in support of the Omnibus Filing Regarding Sealing Joint Letter Brief on Meta's Response to State Attorneys Generals' Request for Production Number 102. The Declaration is based on my personal knowledge and experience at Meta. If called upon to do so, I could and would competently testify as follows.

2. In my experience, it is common for Meta employees whose names are disclosed publicly in connection with hot-button social issues to face harassment, online threats, and/or suspicious phone calls, text messages, or emails. The risk of harassment, threats, and such contacts is materially greater if the employee is publicly connected to such issues, than if the individual is merely connected publicly to Meta (e.g., on LinkedIn) or even to a particular Meta team.

3. Once an employee's name is made public, it can often be easy for individuals wishing them harm to locate their home address and contact information on the internet. Accordingly, in the past, Comprehensive Security Support Plans have sometimes had to be put in place for the safety of the employee and their family.

4. Based on my experience, the allegations in the complaints in this case, including allegations that Meta has harmed the mental health of minors, are of the sort that could cause Meta employees to face harassment and/or threats if their names were publicly linked to those allegations.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on April 7, 2025.

By:

Signed by:

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Andre Suite